

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS, HOUSTON DIVISION

IN RE:

REFRESHING USA, LLC

Debtor¹

§
§
§
§
§
§

Chapter 11

CASE NO. 24-33919
(Jointly Administered)

DECLARATION OF DONALD JAMES ISO MOTION FOR RELIEF FROM STAY AS
TO CERTAIN WATER MACHINES

I, Donald James, do hereby swear and affirm as follows:

1. I am the Manager of James Group International LLC ("*James Group*"). I am of legal age and competent to testify to the matters contained herein.

2. My father, Ronald James, was the previous Manager of James Group. He executed the contract at issue between James Group and Water Station Management, LLC.

¹ 1 Debtors and debtors in possession these Chapter 11 cases ("Bankruptcy Case(s)"), along with the last four digits of their respective Employer Identification Numbers, are as follows: Refreshing USA, LLC (85-3358945) ("Refreshing"), Case No. 24-33919; Water Station Management LLC (81-1202716) ("Water Station"), Case No. 24-33924; and Creative Technologies, LLC (46- 2581888) ("Creative" and, together with Refreshing and Water Station, "Debtors"), Case No. 24- 33934. Debtors' mailing address is: 2732 Grand Ave., Ste. 122, Everett, WA 98201

DECLARATION OF DONALD JAMES ISO MOTION
FOR RELIEF FROM STAY AS TO CERTAIN
WATER MACHINES
NO. 24-33924-ARP, NO. 24-33919-ARP,
NO. 24-33934-ARP (1)

NORTH CITY LAW, PC
17713 Fifteenth Avenue NE, Suite 101
Shoreline, WA 98155-3839
Phone: 206.413.7288
Fax: 206.367.0120

3. My father began having what we thought were Parkinson's symptoms some time in 2016.

4. His neurologist started to also note signs of dementia, related to the then Parkinsons diagnosis. His disease wasn't displaying the typical symptoms and didn't respond to the L-Dopa medications. His relief at times was temporary and his tremors were not well managed. Sometimes he would become catatonic.

5. When Ron met with Ryan Wear, Richard Wear, and others in or around December 2019, I had to hire a wheelchair to get him through the airport and travel to the Water Station offices in Everett.

6. During the next several months, his decision making was impaired by occasional staring spells and "hallucinations". He would at times fall asleep at his desk. He became more forgetful and agitated.

7. As 2021-2024 progressed, he continued to decline. He had moments of lucid clarity, offset with stretches of incapacity.

8. In or near January 2024, my father was diagnosed with brain cancer, specifically two (2) large glioblastomas. His medical providers admitted that also admitted that the locations of the tumors could have illustrated symptoms similar to his initial Parkinsons diagnosis.

9. Over time, his condition declined. Ronald James died April 20th, 2024.

10. I truly believe he was misdiagnosed with Parkinson's disease and was actually suffering from these brain tumors in 2018.

11. He lacked the capability to properly pursue the UCC filings due to the effects of the tumors and their impact on his cognitive abilities and ability to follow through on needed requirements.

EXECUTED this Tuesday, November 5, 2024, in Lafayette, California.

I, the undersigned, declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

/s/ Donald "Don" James
Donald James

DECLARATION OF DONALD JAMES ISO MOTION
FOR RELIEF FROM STAY AS TO CERTAIN
WATER MACHINES
NO. 24-33924-ARP, NO. 24-33919-ARP,
NO. 24-33934-ARP (2)

NORTH CITY LAW, PC
17713 Fifteenth Avenue NE, Suite 101
Shoreline, WA 98155-3839
Phone: 206.413.7288
Fax: 206.367.0120